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DEC 19 2023

Sims, Shawn Andrea  
561 S Mount Juliet Rd 546  
Mount Juliet, Tenn

U.S. District Court  
Middle District of TN

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THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

Shawn Andrea Sims, )  
                        )  
Complainant,         ) In Equity  
                        )  
V.                     )  
                        )  
Navy Federal Credit Union, ) To the Honorable, the Judges of the District of  
                        ) Middle Tennessee  
                        )  
Respondent,          )

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BILL OF COMPLAINT

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Shawn Andrea Sims, an investor, a member of Navy Federal with equitable ownership interest, of the City of Mount Juliet and a national of the State of Tennessee, brings this, his Bill, to seek an equitable resolution to the issues described herein. I bring this Bill and state the following:

Navy Federal Credit Union and its subsidiaries, a corporation, organized under the laws of the city of Vienna, a citizen of the State of Virginia; which has an operating branch authorized to do business in the State of Tennessee. And thereupon your orator complains and says that----

FACTUAL BACKGROUND

1. On January 26, 2022, I entered into a consumer commercial credit transaction for a personal vehicle with Navy Federal Credit Union. I issued, Navy Federal Credit Union an "application" and a "promissory note."

2. I sent Navy Federal Credit Union an amendment to our agreement altering the terms and seeking Full Disclosure of our transaction. This amendment was sent via certified mail #7021 0350 0000 8492 9854 and was received March 11, 2022.
3. On June 10, 2022 I sent Navy Federal, via certified mail return receipt #7022 0410 0003 0438 3391, notice of my intent to rescind our transaction.
4. Navy Federal did not return my property within the 20 days allowed and continued to send false and misleading statements saying that I still owed a debt to them. Navy Federal then reported a false debt on my consumer report without giving the required notices or policy so that I may direct that this information not be reported.
5. At all times, Navy Federal was acting in the capacity of a Securities intermediary, a Fiduciary, and a member of the Federal Reserve.

#### CLAIMS

1. I am bringing this claim for fraud in the inducement because Navy Federal omitted facts that were pertinent to the terms of the agreement we entered into. Navy Federal tricked me into believing that they were loaning me lawful money but failed to mention that the instruments I issued them were financial assets that they could negotiate for the full face value; and that they would shift their obligation to perform on our agreement to me and make me liable for their debt. 16 CFR 424.1; Tenn Code Ann 47-18-104 Unfair or deceptive acts prohibited (See Exhibit A 1)
2. I am bringing this claim for violations of the Rescission Act of 1946 because I gave Navy Federal a notice of my intent to rescind the transaction due to the lack of full disclosure. They failed to comply with the rescission notice and are now liable to me under Federal Law. UCC 2-209; TCA 47-2-209 Modification, Rescission and Waiver (See Exhibit A 2).
3. I am bringing this claim of Defamation of character, Libel, since Navy Federal is reporting false information about me owing a canceled debt to third parties damaging my reputation.UCC 1-304; TCA 47-1-304 Obligation Of Good Faith (See Exhibit A 3)

4. I am bringing this claim for the breach of Fiduciary duty by Navy Federal For failing to act in Good Faith and repeatedly omitting facts that should have been disclosed.

The above violations have damaged my ability to borrow against my credit, to contract, and gain things that are essential to living a fulfilling and happy life. My reputation has been ruined, I have been thrown into poverty and have been forced to live with relatives, I am unable to find adequate living accommodations or a high paying job. Navy Federal is in possession of my property and refuses to give it back or to give any consideration.

WHEREFORE, I pray for the following equitable relief:

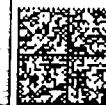
1. \$687,000,000.00 for civil money penalties for a 3rd tier breach of fiduciary duty by a member bank
2. \$25,000,000.00 in punitive damages for Fraud
3. \$10,000,000.00 in Emotional Damages
4. An injunction requiring Navy Federal to cease and desist from further defamation
5. For costs of suit incurred herein; and
6. For such other and further relief as the Court may deem just and proper.

I, Shawn Andrea Sims, take Oath that the statements herein are true and correct to the best of my first hand knowledge and belief.



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Shawn Sims  
651 S Mount Juliet Rd 597  
Mount Juliet, TN 37122



U.S. POSTAGE  
\$2.07  
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U.S. District Court  
Middle District of TN

Clerk's Office  
United States District Court  
Middle District of Tennessee  
719 Church St, Ste 1300  
Nashville, TN 37203